

Ver Ploeg & Lumpkin, P.A.

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Tax ID #65-0615033

September 11, 2014

Melanie E. Damian
Damian Valori, LLP
as Receiver for Aubrey Lee Price
1000 Brickell Avenue
Suite 1020
Miami, FL 33131

Billing through 08/31/14
Invoice Number 12278
Account Number D032-00100

Damian, Melanie E. Esq. - Aubrey Lee Price

FOR PROFESSIONAL SERVICES RENDERED

08/01/14	JSM	ASSET ANALYSIS AND RECOVERY: Emails with Mr. Mills re: meeting on bonds	0.10
08/01/14	JSM	Email from MLB to Mr. Murena re: responses to insurance carriers' discovery requests	0.10
08/01/14	CDS	ASSET ANALYSIS AND RECOVERY: Review and revise Receiver's answers to interrogatories, RFPs, and RFAs in connection with life insurance litigation.	1.20
08/01/14	MLB	ASSET ANALYSIS AND RECOVERY: Draft/revise responses to carriers' discovery requests in life insurance matter	3.00
08/04/14	JSM	ASSET ANALYSIS AND RECOVERY: Emails with Mr. Murena and MLB re: discovery responses	0.10
08/04/14	JSM	ASSET ANALYSIS AND RECOVERY: Emails with Receiver and Mr. Cuervo re: settlement meeting	0.10
08/04/14	JSM	ASSET ANALYSIS AND RECOVERY: Email from Ms. Glasgow re: consent motion for extension	0.10
08/04/14	CDS	ASSET ANALYSIS AND RECOVERY: Review/analyze MAM complaint in conjunction with policy to evaluate sufficiency of counts in light of coverage and Georgia law.	1.90
08/04/14	CDS	ASSET ANALYSIS AND RECOVERY: Review/analyze 2012 D&O policy, prior coverage analysis, and draft complaint from Receiver in order to evaluate sufficiency and draft action plan.	2.80
08/04/14	CDS	ASSET ANALYSIS AND RECOVERY: Review/analyze Georgia law [REDACTED]	1.00
08/04/14	CDS	ASSET ANALYSIS AND RECOVERY: Review and revise proposed motion and order requesting stipulated deadline for Receiver to respond to dec action in connection with bond.	0.50
08/04/14	MLB	ASSET ANALYSIS AND RECOVERY: Plan and prepare for review of policies and strategy with JSM, CDS	0.20
08/05/14	JSM	ASSET ANALYSIS AND RECOVERY: Follow-up emails with Mr. Mills re: settlement conference; email to Receiver regarding same	0.10
08/05/14	CDS	ASSET ANALYSIS AND RECOVERY: Receive and review final redline revisions to consent motion and order setting date for response to complaint.	0.10
08/05/14	CDS	ASSET ANALYSIS AND RECOVERY: Draft comprehensive action plan for Receiver in order to bring insurance litigation to conclusion.	2.10

PLEASE INCLUDE INVOICE NUMBER 12278 WITH YOUR PAYMENT. THANK YOU.

EXHIBIT "C"

08/05/14	CDS	ASSET ANALYSIS AND RECOVERY: Review/analyze case law provided by FDIC regarding ability to dismiss declaratory judgment action on bond.	0.70
08/05/14	CDS	ASSET ANALYSIS AND RECOVERY: Review/analyze 2008 D&O Policy, demand letter provided to FDIC for approval, Receiver's Third Amended Complaint, and prior coverage analysis in order to draft action plan.	2.80
08/05/14	MLB	ASSET ANALYSIS AND RECOVERY: Receive and review redline from Receiver re: discovery responses, incorporate revisions into responses	0.40
08/06/14	CDS	ASSET ANALYSIS AND RECOVERY: Draft analysis of action plan for Receiver in order to facilitate recovery on bond, D&O policies, and professional liability policy.	3.50
08/06/14	MLB	ASSET ANALYSIS AND RECOVERY: Draft/revise responses to carriers' discovery, finalize same	3.80
08/07/14	CDS	ASSET ANALYSIS AND RECOVERY: Draft analysis of action plan for Receiver in order to facilitate recovery on bond, D&O policies, and professional liability policy.	7.20
08/07/14	MLB	ASSET ANALYSIS AND RECOVERY: Plan and prepare for follow up with client, CDS re: action plan	0.20
08/08/14	CDS	ASSET ANALYSIS AND RECOVERY: Draft analysis of action plan for Receiver in order to facilitate recovery on bond, D&O policies, and professional liability policy.	5.80
08/10/14	CDS	ASSET ANALYSIS AND RECOVERY: Revise analysis of action plan for Receiver in order to advance matters regarding bond, D&O policies, and professional liability policy.	1.90
08/11/14	CDS	ASSET ANALYSIS AND RECOVERY: Revise analysis of action plan for Receiver in order to advance matters regarding bond, D&O policies, and professional liability policy.	2.50
08/12/14	JSM	ASSET ANALYSIS AND RECOVERY: Trade emails with Mr Lichtman re: Travelers bond issue meeting.	0.20
08/13/14	JSM	ASSET ANALYSIS AND RECOVERY: Revise [REDACTED] discuss changes with CDS.	2.50
08/13/14	JSM	ASSET ANALYSIS AND RECOVERY: Trade emails with MLB re: court ordered stipulated facts.	0.20
08/13/14	JSM	ASSET ANALYSIS AND RECOVERY: Email from Mr. Mayfield with draft Joint Statement of Stipulated Facts	0.10
08/13/14	KMS	ASSET ANALYSIS AND RECOVERY: Review documents produced to life carriers and make notations on key facts on draft stipulated facts	0.40
08/13/14	CDS	ASSET ANALYSIS AND RECOVERY: Revise and finalize analysis of action plan for Receiver regarding various insurance policies at issue.	1.20
08/13/14	MLB	ASSET ANALYSIS AND RECOVERY: Draft/revise proposed statement of stipulated facts to life insurance carriers	4.20
08/13/14	MLB	ASSET ANALYSIS AND RECOVERY: Receive and review carriers' proposed statement of stipulated facts to life insurance carriers, dictate redline and confer with KMS re: same	1.50
08/14/14	JSM	ASSET ANALYSIS AND RECOVERY: Review, revise and red-line draft statements of stipulated facts.	1.60
08/14/14	KMS	ASSET ANALYSIS AND RECOVERY: Merge Receiver's redline facts with acceptable facts from carriers	0.30
08/14/14	KMS	ASSET ANALYSIS AND RECOVERY: Review and revise redline facts in life carrier litigation; confer with JSM regarding same and forward copy of redline facts to Receiver	0.40
08/14/14	KMS	ASSET ANALYSIS AND RECOVERY: Confer with JSM regarding Stipulated Facts	0.10
08/14/14	CDS	ASSET ANALYSIS AND RECOVERY: Draft e-mail correspondence to Ms. Davis regarding concerns with financials and Receiver's ability to recover under bond.	0.20
08/15/14	JSM	ASSET ANALYSIS AND RECOVERY: Leave phone message for Mr Murena.	0.10
08/15/14	JSM	ASSET ANALYSIS AND RECOVERY: Email from CDS to Ms. Davis re: insuring agreement under bond	0.10

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08/15/14	JSM	ASSET ANALYSIS AND RECOVERY: Exchange emails with KMS regarding Stipulated Facts	0.10
08/15/14	JSM	ASSET ANALYSIS AND RECOVERY: Exchange emails with KMS re: Mr. Murena's approval of draft joint stipulated facts	0.10
08/15/14	CDS	ASSET ANALYSIS AND RECOVERY: Telephone conference with Ms. Davis regarding accounting of Price's improper transfers; draft notes regarding same.	0.60
08/18/14	JSM	ASSET ANALYSIS AND RECOVERY: Read detailed email from CDS to Ms. Banez re: proof of loss analysis	0.10
08/18/14	JSM	ASSET ANALYSIS AND RECOVERY: Email from Ms. Davis re: proof of loss schedules	0.10
08/18/14	JSM	ASSET ANALYSIS AND RECOVERY: Exchange emails with MLB, Mr. Cuervo and Mr. Mayfield re: final version of Stipulated Facts for filing	0.10
08/18/14	KMS	ASSET ANALYSIS AND RECOVERY: Confer with MLB on Joint Stipulated Facts; send email to carriers' counsel regarding same	0.10
08/18/14	KMS	ASSET ANALYSIS AND RECOVERY: Read emails between CDS and Mr. Giberson re: preparation for bond meeting in Atlanta	0.10
08/18/14	CDS	ASSET ANALYSIS AND RECOVERY: Draft various e-mail correspondence to Mr. Murena and Ms. Davis regarding updating bond financials and preparation for meeting with carrier.	0.20
08/18/14	MLB	ASSET ANALYSIS AND RECOVERY: Draft/revise redline to joint stipulated statement of facts, confer with carriers re: same	1.90
08/19/14	JSM	ASSET ANALYSIS AND RECOVERY: Email from CDS to Mr. Giberson re: FDIC and joint demand	0.10
08/19/14	JSM	ASSET ANALYSIS AND RECOVERY: Phone call with CDS re: strategy for meeting with carrier on Monday in Price.	0.30
08/19/14	JSM	ASSET ANALYSIS AND RECOVERY: Email from Mr. Banez forwarding additional charts and schedules for proof of loss	0.10
08/19/14	JSM	ASSET ANALYSIS AND RECOVERY: Confer with CDS and KMS re: strategy for upcoming meeting in Atlanta with Receiver	0.10
08/19/14	JSM	ASSET ANALYSIS AND RECOVERY: Email from Mr. Giberson re: communications with FDIC and Mr. Curley	0.10
08/19/14	KMS	ASSET ANALYSIS AND RECOVERY: Confer with JSM and CDS re: bonds	0.10
08/19/14	CDS	ASSET ANALYSIS AND RECOVERY: Review/analyze updated financials provided by Ms. Davis, proof of loss materials, and policy in preparation for meeting with carrier.	1.90
08/19/14	CDS	ASSET ANALYSIS AND RECOVERY: Office conference with JSM and KMS case status and upcoming matters.	0.10
08/19/14	CDS	ASSET ANALYSIS AND RECOVERY: Draft e-mail correspondence to JSM regarding case status and upcoming assignments.	0.10
08/19/14	CDS	ASSET ANALYSIS AND RECOVERY: Telephone conference with Mr. Giberson regarding [REDACTED]	0.40
08/19/14	CDS	ASSET ANALYSIS AND RECOVERY: Telephone conference with general counsel regarding [REDACTED]; draft memorandum regarding same.	1.60
08/19/14	CDS	ASSET ANALYSIS AND RECOVERY: Telephone conference with JSM regarding [REDACTED].	0.30
08/20/14	JSM	ASSET ANALYSIS AND RECOVERY: Phone conf with Mr Curley re: cooperation between Receiver and FDIC (.4); draft email to Receiver re: same.	0.50
08/20/14	JSM	ASSET ANALYSIS AND RECOVERY: Draft email to Mr Curley.	0.10
08/20/14	JSM	ASSET ANALYSIS AND RECOVERY: Email from Mr. Giberson re: strategy on bond	0.10
08/20/14	JSM	ASSET ANALYSIS AND RECOVERY: Email to Mr. Giberson re: joint demand on bond	0.10
08/20/14	JSM	ASSET ANALYSIS AND RECOVERY: Email to Mr. Curley re: FDIC response to	0.10

		complaint	
08/20/14	CDS	ASSET ANALYSIS AND RECOVERY: Review/analyze additional financial information received for bond in preparation for call with Ms. Davis and Ms. Banez regarding same.	0.20
08/20/14	CDS	ASSET ANALYSIS AND RECOVERY: Telephone conference with Ms. Davis and Ms. Banez regarding final questions on bond financials and final charts required for meeting with carrier.	0.50
08/20/14	CDS	ASSET ANALYSIS AND RECOVERY: Draft [REDACTED] in preparation for meeting with carrier.	3.00
08/20/14	CDS	ASSET ANALYSIS AND RECOVERY: Review/analyze [REDACTED]	0.70
08/21/14	JSM	ASSET ANALYSIS AND RECOVERY: Read emails from counsel for life insurance carriers re: responses to discovery	0.10
08/21/14	JSM	ASSET ANALYSIS AND RECOVERY: Email to Receiver and her counsel re: FDIC	0.10
08/21/14	JSM	ASSET ANALYSIS AND RECOVERY: Email to MLB re: instructions as to strategy for discovery	0.10
08/21/14	JSM	ASSET ANALYSIS AND RECOVERY: Briefly review responses by life insurers to Receiver's written discovery; trade emails with MLB re: response.	0.50
08/21/14	JSM	ASSET ANALYSIS AND RECOVERY: Read email from Mr Curley; draft email to Receiver re: same.	0.10
08/21/14	KMS	ASSET ANALYSIS AND RECOVERY: Review privilege log provided by carriers	0.10
08/21/14	KMS	ASSET ANALYSIS AND RECOVERY: Review court deadline for experts	0.10
08/21/14	CDS	ASSET ANALYSIS AND RECOVERY: Revise [REDACTED] for JSM and Receiver in preparation for meeting with St. Paul regarding bond.	5.40
08/22/14	JSM	ASSET ANALYSIS AND RECOVERY: Emails with KMS and CDS re: meeting with FDIC	0.10
08/22/14	KMS	ASSET ANALYSIS AND RECOVERY: Confer with CDS and prepare notebook for Atlanta meeting on bond	0.70
08/22/14	CDS	ASSET ANALYSIS AND RECOVERY: Revise/finalize [REDACTED] for meeting with St. Paul on bond; compile materials for JSM's review.	0.90
08/22/14	MLB	ASSET ANALYSIS AND RECOVERY: Receive and review incoming carrier discovery responses, trade email with KMS and JSM re: follow up action plan	0.80
08/25/14	JSM	Email to CDS re: [REDACTED]	0.10
08/25/14	JSM	ASSET ANALYSIS AND RECOVERY: Travel to Atlanta for settlement conference; prepare en route by review of forensics memos and bond; meet with Receiver and then with Travelers reps and their counsel; confer with Receiver following meeting re: next steps	8.80
08/25/14	JSM	ASSET ANALYSIS AND RECOVERY: Review email from Ms. Davis re: [REDACTED]	0.10
08/25/14	JSM	Follow-up email from CDS re: [REDACTED]	0.10
08/25/14	JSM	ASSET ANALYSIS AND RECOVERY: Read email from CDS re [REDACTED]	0.10
08/25/14	CDS	ASSET ANALYSIS AND RECOVERY: Receive and review e-mail correspondence from JSM regarding [REDACTED]; draft [REDACTED]	0.20
08/25/14	CDS	ASSET ANALYSIS AND RECOVERY: Receive and review e-mail correspondence from JSM regarding [REDACTED]; draft response to same; call Mr. Giberson regarding same.	0.30
08/25/14	CDS	ASSET ANALYSIS AND RECOVERY: Receive and review email correspondence from Ms. Davis and JSM regarding [REDACTED]; review [REDACTED] provided and draft e-mail correspondence to JSM regarding same.	0.70
08/25/14	MLB	ASSET ANALYSIS AND RECOVERY: Receive and review, trade emails and calls with carriers re: production of documents, initial review of discovery responses	0.70

08/26/14	JSM	Email from CDS re: revised agreement with FDIC	0.10
08/26/14	JSM	ASSET ANALYSIS AND RECOVERY: Return to Miami from meeting with FDIC in Atlanta	4.70
08/26/14	JSM	ASSET ANALYSIS AND RECOVERY: Email from MLB to carrier's counsel re: documents in response to Receiver's discovery	0.10
08/26/14	JSM	ASSET ANALYSIS AND RECOVERY: Emails from Mr. Mills re: Rule 16 conference	0.10
08/26/14	JSM	ASSET ANALYSIS AND RECOVERY: Email to CDS regarding settlement agreement with FDIC	0.10
08/26/14	CDS	ASSET ANALYSIS AND RECOVERY: Review/analyze prior settlement documents regarding language to include in settlement with FDIC regarding cooperation and joint demand on St. Paul.	0.60
08/26/14	CDS	ASSET ANALYSIS AND RECOVERY: Receive and review e-mail correspondence regarding Rule 26 conference; draft e-mail correspondence to JSM regarding same.	0.10
08/26/14	CDS	ASSET ANALYSIS AND RECOVERY: Receive and review proposed redline settlement agreement between FDIC and Receiver regarding potential insurance implications; review/analyze correspondence from FDIC regarding final issues to address before agreement can be summarized; revise agreement to include provision for cooperation in securing bond proceeds; draft e-mail correspondence to JSM regarding same.	1.80
08/26/14	CDS	ASSET ANALYSIS AND RECOVERY: Review/analyze [REDACTED] telephone message left regarding same.	0.20
08/26/14	CDS	ASSET ANALYSIS AND RECOVERY: Review/analyze motion to dismiss filed by FDIC regarding bond; draft e-mail correspondence to Mr. Murena regarding conferral for Rule 26 report.	0.90
08/26/14	MLB	ASSET ANALYSIS AND RECOVERY: Draft/revise email to counsel re: document production, related follow up notes re: carrier privilege logs	0.20
08/27/14	JSM	ASSET ANALYSIS AND RECOVERY: Review incoming correspondence from Namrata Joshi re: document production	0.10
08/27/14	JSM	ASSET ANALYSIS AND RECOVERY: Trade emails with Mr Murena re: FDIC cooperation language.	0.10
08/27/14	JSM	ASSET ANALYSIS AND RECOVERY: Emails with Mr. Murena re: cooperation language for global agreement	0.10
08/27/14	CDS	ASSET ANALYSIS AND RECOVERY: Office conference with JSM regarding Atlanta meeting and cooperation with FDIC.	0.30
08/27/14	CDS	ASSET ANALYSIS AND RECOVERY: Office conference with JSM regarding meeting with FDIC.	0.10
08/27/14	CDS	ASSET ANALYSIS AND RECOVERY: Review/analyze supplements to FTC's motion to dismiss.	0.50
08/27/14	MLB	ASSET ANALYSIS AND RECOVERY: Receive and review Genworth document production, sound files, email from carrier re: additional document production	4.00
08/28/14	JSM	ASSET ANALYSIS AND RECOVERY: Case plan conference with MLB; discuss expert retention, written discovery, motions to compel and needed depositions.	0.40
08/28/14	JSM	ASSET ANALYSIS AND RECOVERY: Review redline revisions to agreement with FDIC and CDS's email to Receiver regarding same	0.10
08/28/14	JSM	ASSET ANALYSIS AND RECOVERY: Confer with MLB and KMS re: expert disclosures	0.10
08/28/14	JSM	ASSET ANALYSIS AND RECOVERY: Review proposed cooperation language	0.10
08/28/14	JSM	ASSET ANALYSIS AND RECOVERY: Review proposed SA with FDIC Receiver, revise cooperation language re: insurance recovery efforts and confer with CDS re: same	0.40
08/28/14	CDS	ASSET ANALYSIS AND RECOVERY: Revise agreement with FDIC as per discussions with JSM regarding various insurance policies and split of policy proceeds.	1.00
08/28/14	CDS	ASSET ANALYSIS AND RECOVERY: Office conference with JSM regarding final	0.40

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		revisions to agreement with FDIC; draft revisions to same and provide to counsel.	
08/28/14	MLB	ASSET ANALYSIS AND RECOVERY: Research re: [REDACTED]	4.10
08/28/14	MLB	ASSET ANALYSIS AND RECOVERY: Continue research re: [REDACTED]	2.90
		plan for consultation with JSM and set up conferral call with Genworth re: same	
08/29/14	JSM	ASSET ANALYSIS AND RECOVERY: Confer with MLB re: mediation.	0.10
08/29/14	JSM	ASSET ANALYSIS AND RECOVERY: Email from MLB with discovery plan; reply to same	0.10
08/29/14	JSM	ASSET ANALYSIS AND RECOVERY: Email from Mr. Feinberg in response to Receiver's request for production	0.10
08/29/14	JSM	ASSET ANALYSIS AND RECOVERY: Confer with CDS re: proposed scheduling report in bond dec action.	0.10
08/29/14	CDS	ASSET ANALYSIS AND RECOVERY: Draft e-mail correspondence to opposing counsel regarding Rule 26 call on bond dec action.	0.10
08/29/14	CDS	ASSET ANALYSIS AND RECOVERY: Plan and prepare for Rule 26 call with carrier on bond regarding scheduling order; telephone conference with carrier regarding same.	0.60
08/29/14	CDS	ASSET ANALYSIS AND RECOVERY: Revise proposed scheduling order in accordance with call with opposing counsel.	0.30
08/29/14	CDS	ASSET ANALYSIS AND RECOVERY: Office conference with JSM regarding scheduling for trial.	0.10
08/29/14	MLB	ASSET ANALYSIS AND RECOVERY: Receive and review carrier discovery responses, draft conferral email re: same to counsel	0.80

Timekeeper	Hours	Rate	Amount
Steklof, Cary D.	59.50	250.00	\$14,875.00
Mazer, Jason S.	24.60	565.00	\$7,627.00
Shaw, Kathleen M.	2.40	235.00	\$564.00
Baldwin, Matthew L	28.70	260.00	\$7,462.00

Total fees for this matter 115.20 hrs. \$30,528.00

DISBURSEMENTS

West Payment Center; Online Research; services through Jul 31, 2014	24.28
AMEX; Pacer Apr 1 - Jun 30, 2014	7.20
Color Photocopies	95.00
Photocopies	331.95

Total disbursements for this matter \$458.43

BILLING SUMMARY

TOTAL FEES	\$30,528.00
TOTAL DISBURSEMENTS	\$458.43
TOTAL CHARGES FOR THIS BILL	\$30,986.43
PLUS NET BALANCE FORWARD	\$74,270.47
TOTAL BALANCE NOW DUE	\$105,256.90

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BILLING HISTORY

	<u>Billed to Date</u>		<u>Received to Date</u>
Fees	\$160,842.75	Fees	\$87,041.60
Expenses	\$2,955.02	Expenses	\$2,485.70

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Tax ID #65-0615033

November 17, 2014

Melanie E. Damian, Esq.
Damian Valori, LLP
as Receiver for Aubrey Lee Price
1000 Brickell Avenue
Suite 1020
Miami, FL 33131

Billing through 09/30/14
Invoice Number 12544
Account Number D032-00100

Damian, Melanie E. Esq. - Aubrey Lee Price

FOR PROFESSIONAL SERVICES RENDERED

09/01/14	JSM	ASSET ANALYSIS AND RECOVERY: Email from Mr. Murena re: draft agreement with FDIC	0.10
09/02/14	JSM	ASSET ANALYSIS AND RECOVERY: Email with Ms. Davis re: financial analysis	0.10
09/02/14	JSM	ASSET ANALYSIS AND RECOVERY: Trade vm messages with Mr Curley.	0.10
09/02/14	JSM	ASSET ANALYSIS AND RECOVERY: Confer with CDS re: answer to dec action	0.30
09/02/14	JSM	ASSET ANALYSIS AND RECOVERY: Confer with MLB and KMS re: expert disclosures	0.20
09/02/14	JSM	ASSET ANALYSIS AND RECOVERY: Email from CDS re: response to dec action	0.10
09/02/14	KMS	ASSET ANALYSIS AND RECOVERY: Meeting with JSM and MLB re: expert disclosure, mediation, and discovery	0.10
09/02/14	CDS	ASSET ANALYSIS AND RECOVERY: Revise draft of joint preliminary report and discovery plan in bond action.	0.70
09/02/14	CDS	ASSET ANALYSIS AND RECOVERY: Draft various e-mails to Mr. Murena and Ms. Davis regarding bond issues to follow up on.	0.10
09/02/14	CDS	ASSET ANALYSIS AND RECOVERY: Office conference with JSM regarding response to carrier's dec action regarding bond.	0.30
09/02/14	MLB	ASSET ANALYSIS AND RECOVERY: Receive and review, trade email with carriers' counsel re: discovery conferrals, confer with JSM re: same	0.40
09/03/14	JSM	ASSET ANALYSIS AND RECOVERY: Phone conf with Mr Murena and Mr Giberson re: bond coverage argument.	0.20
09/03/14	JSM	ASSET ANALYSIS AND RECOVERY: Confer with MLB and KMS re: claim handling expert	0.20
09/03/14	JSM	ASSET ANALYSIS AND RECOVERY: Email from Mr. Curley re: draft motion to say discovery; trade emails with CDS regarding same	0.10
09/03/14	JSM	ASSET ANALYSIS AND RECOVERY: Confer with CDS re: response to bond dec action and fee shifting under Ga law.	0.20
09/03/14	CDS	ASSET ANALYSIS AND RECOVERY: Revise joint preliminary report and discovery plan.	0.40
09/03/14	CDS	ASSET ANALYSIS AND RECOVERY: Telephone conference with Ms. Davis regarding additional financial information required to provide to carrier in bond litigation.	0.60
09/03/14	CDS	ASSET ANALYSIS AND RECOVERY: Office conference with JSM regarding	0.20

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09/03/14	CDS	ASSET ANALYSIS AND RECOVERY: Telephone conference with Mr. Giberson and Mr. Murena regarding [REDACTED] [REDACTED] draft notes regarding same [REDACTED] [REDACTED]	1.20
09/03/14	MLB	ASSET ANALYSIS AND RECOVERY: Trade emails and held telephone conference with Genworth's counsel re: discovery conferral issues	0.90
09/03/14	MLB	ASSET ANALYSIS AND RECOVERY: Plan and prepare for telephone conference with Genworth's counsel re: discovery conferral	0.50
09/03/14	MLB	ASSET ANALYSIS AND RECOVERY: Trade email with Receiver, opposing counsel, and team re: mediation, settlement meeting, discussion of discovery production and conferrals	0.90
09/03/14	MLB	ASSET ANALYSIS AND RECOVERY: Research re: attorney client privilege and work product doctrines under GA law, emphasis on in-house counsel issues	0.60
09/04/14	CDS	ASSET ANALYSIS AND RECOVERY: Receive and review proposed motion to stay discovery pending ruling on motion to dismiss; draft e-mail to JSM regarding same.	0.30
09/04/14	MLB	ASSET ANALYSIS AND RECOVERY: Plan and prepare for retention of expert witness	0.30
09/05/14	JSM	ASSET ANALYSIS AND RECOVERY: Phone conf with Mr Dinsmore.	0.30
09/05/14	JSM	ASSET ANALYSIS AND RECOVERY: Phone conf with Receiver re: life insurance case issues and re: bond litigation strategy.	1.00
09/05/14	CDS	ASSET ANALYSIS AND RECOVERY: Research [REDACTED] [REDACTED]	1.30
09/05/14	CDS	ASSET ANALYSIS AND RECOVERY: Telephone conference with Receiver regarding motion to stay discovery and [REDACTED] [REDACTED]	0.70
09/05/14	MLB	ASSET ANALYSIS AND RECOVERY: Telephone conferences with life insurance carriers and Receiver re: discovery conferrals, settlement meeting, scheduling	1.90
09/07/14	CDS	ASSET ANALYSIS AND RECOVERY: Research [REDACTED] [REDACTED]	0.70
09/08/14	JSM	ASSET ANALYSIS AND RECOVERY: Office conference with CDS regarding answer and counterclaim to dec action in bond matter and additional information to obtain from Ms. Davis	0.20
09/08/14	CDS	ASSET ANALYSIS AND RECOVERY: Draft answer, affirmative defenses, and counterclaim to St. Paul's complaint for declaratory relief.	6.90
09/08/14	CDS	ASSET ANALYSIS AND RECOVERY: Office conference with JSM regarding answer and counterclaim to dec action in Bond matter and [REDACTED] [REDACTED]	0.20
09/09/14	JSM	Email from CDS to Receiver re: [REDACTED] read reply by Mr. Giberson	0.10
09/09/14	CDS	ASSET ANALYSIS AND RECOVERY: Draft/revise answer, affirmative defenses, and counterclaim to St. Paul's dec action in bond litigation.	4.60
09/09/14	CDS	ASSET ANALYSIS AND RECOVERY: Telephone conference with Ms. Davis regarding [REDACTED] [REDACTED] [REDACTED]	0.50
09/09/14	MLB	ASSET ANALYSIS AND RECOVERY: Receive and review, trade email with potential expert, team re: retention and settlement meeting	0.30
09/10/14	JSM	ASSET ANALYSIS AND RECOVERY: Phone call with Receiver re: [REDACTED] [REDACTED]	0.20
09/10/14	JSM	ASSET ANALYSIS AND RECOVERY: Conferences with CDS re: [REDACTED] [REDACTED]	0.30
09/10/14	JSM	Email from Mr. Giberson re: [REDACTED]	0.10
09/10/14	JSM	ASSET ANALYSIS AND RECOVERY: Review email from CDS to Ms. Glasgow re: Joint Preliminary Report	0.10

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09/10/14	JSM	ASSET ANALYSIS AND RECOVERY: Office conference with CDS regarding [REDACTED] [REDACTED]	0.10
09/10/14	JSM	ASSET ANALYSIS AND RECOVERY: Emails with Mr. Giberson and CDS re: investor interests in PFGBI	0.10
09/10/14	JSM	ASSET ANALYSIS AND RECOVERY: Emails with Receiver's counsel and accountants re: [REDACTED]	0.10
09/10/14	CDS	ASSET ANALYSIS AND RECOVERY: Revise Joint Preliminary Report and Discovery Plan and provide to opposing counsel.	0.60
09/10/14	CDS	ASSET ANALYSIS AND RECOVERY: Receive and review various e-mail correspondence from Receiver's counsel regarding [REDACTED] draft responsive e-mail correspondence regarding same.	0.50
09/10/14	CDS	ASSET ANALYSIS AND RECOVERY: Draft e-mail correspondence to team regarding [REDACTED]	0.20
09/10/14	CDS	ASSET ANALYSIS AND RECOVERY: Revise answer, affirmative defenses, and counterclaim to carrier's dec action in bond matter.	1.00
09/10/14	CDS	ASSET ANALYSIS AND RECOVERY: Office conference with JSM regarding [REDACTED] [REDACTED]	0.10
09/11/14	JSM	Email from CDS to Receiver re: draft Answer, Affirmative Defenses, and Counterclaim	0.10
09/11/14	JSM	ASSET ANALYSIS AND RECOVERY: Analyze Liberty Life decision in D. Ariz re: permissible scope of expert testimony.	0.50
09/11/14	JSM	Finalize Answer and Affirmative Defenses	0.10
09/11/14	JSM	ASSET ANALYSIS AND RECOVERY: Revise Answer, defenses and counterclaim, confer with CDS and call with Receiver's counsel to finalize (.5)	1.00
09/11/14	JSM	ASSET ANALYSIS AND RECOVERY: Confer with MLB re: discovery letter and setting 30b6 depositions	0.30
09/11/14	CDS	ASSET ANALYSIS AND RECOVERY: Receive and review various e-mail correspondence regarding [REDACTED] [REDACTED]	0.30
09/11/14	CDS	ASSET ANALYSIS AND RECOVERY: Draft/revise answer/counterclaim in accordance with Mr. Giberson's comments and revisions; review final draft and finalize for filing; draft various e-mail correspondence with LMP to coordinate filing.	2.50
09/11/14	CDS	ASSET ANALYSIS AND RECOVERY: Telephone conference with Mr. Murena and Mr. Giberson in order to finalize answer/counterclaim.	0.50
09/11/14	MLB	ASSET ANALYSIS AND RECOVERY: Receive and review, trade email with JSM, opposing counsel re: [REDACTED] [REDACTED]	1.20
09/12/14	MLB	ASSET ANALYSIS AND RECOVERY: Plan and prepare for follow up re: retention of expert witness, outline for Rule 30(b)(6) depositions of carriers	0.70
09/15/14	JSM	ASSET ANALYSIS AND RECOVERY: Revise Rule 30b6 depo notice to life carriers.	0.20
09/15/14	JSM	ASSET ANALYSIS AND RECOVERY: Emails from Ms. Visconti re: FDIC settlement	0.10
09/15/14	JSM	ASSET ANALYSIS AND RECOVERY: Emails from Ms. Glasgow on scheduling order in bond litigation	0.10
09/15/14	JSM	ASSET ANALYSIS AND RECOVERY: Email from CDS to Ms. Visconti re: JB Grossman	0.10
09/15/14	JSM	ASSET ANALYSIS AND RECOVERY: Review Motion to Stay Proceedings with Brief in Support of FDIC	0.10
09/15/14	MLB	ASSET ANALYSIS AND RECOVERY: Plan and prepare outline for Rule 30(b)(6) deposition, review internal action plan and outline re: same	1.30
09/15/14	MLB	ASSET ANALYSIS AND RECOVERY: Draft/revise Rule 30(b)(6) deposition notices, review with JSM, draft email to carriers re: settlement meeting and deposition scheduling	1.50

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09/16/14	JSM	ASSET ANALYSIS AND RECOVERY: Email from MLB to Receiver re: [REDACTED]	0.10
09/16/14	JSM	ASSET ANALYSIS AND RECOVERY: Phone conf with Receiver (:3); confer with MLB re: next steps following same.	0.40
09/16/14	JSM	ASSET ANALYSIS AND RECOVERY: Email from MLB to Receiver's counsel re: additional documents and damages model	0.10
09/16/14	JSM	ASSET ANALYSIS AND RECOVERY: Email from MLB to Receiver [REDACTED]	0.10
09/16/14	JSM	ASSET ANALYSIS AND RECOVERY: Office conference with CDS regarding proposed scheduling order and drafting of demand letter providing financials	0.10
09/16/14	JSM	ASSET ANALYSIS AND RECOVERY: Email from Ms. Glasgow re: draft joint preliminary report and scheduling order	0.10
09/16/14	JSM	ASSET ANALYSIS AND RECOVERY: Review joint scheduling report in bond matter and exchange emails with CDS regarding same	0.10
09/16/14	CDS	ASSET ANALYSIS AND RECOVERY: Review/analyze revised joint preliminary report and proposed scheduling order from carrier; draft revisions to same to provide final draft.	1.60
09/16/14	CDS	ASSET ANALYSIS AND RECOVERY: Review/analyze prior memos regarding coverage available under bond; draft demand letter to carrier addressing Receiver's coverage case and financials in order to facilitate settlement.	2.20
09/16/14	CDS	ASSET ANALYSIS AND RECOVERY: Office conference with JSM regarding proposed scheduling order and drafting of demand letter providing financials.	0.10
09/16/14	MLB	ASSET ANALYSIS AND RECOVERY: Research re: attorney client privilege in GA	1.40
09/16/14	MLB	ASSET ANALYSIS AND RECOVERY: Research re: work product doctrine applied by GA federal courts	1.30
09/16/14	MLB	ASSET ANALYSIS AND RECOVERY: Draft/revise discovery conferral letter to Genworth	2.10
09/17/14	JSM	ASSET ANALYSIS AND RECOVERY: Email from Ms. Visconti re: revisions to draft complaint	0.10
09/17/14	JSM	ASSET ANALYSIS AND RECOVERY: Emails with CDS re: joint preliminary report and scheduling order in bond action	0.10
09/17/14	JSM	ASSET ANALYSIS AND RECOVERY: Email from CDS to Ms. Glasgow re: revisions to joint pretrial stipulation and scheduling order	0.10
09/17/14	CDS	ASSET ANALYSIS AND RECOVERY: Draft various emails regarding proposed Scheduling Order and dates for same in bond action.	0.20
09/17/14	CDS	ASSET ANALYSIS AND RECOVERY: Draft final revisions to Scheduling Order and Report in bond matter; draft email to opposing counsel regarding same.	0.30
09/17/14	CDS	ASSET ANALYSIS AND RECOVERY: Telephone conference with Ms. Glasgow regarding necessary revisions to Joint Preliminary Report in bond matter.	0.60
09/17/14	CDS	ASSET ANALYSIS AND RECOVERY: Receive and review final draft of Scheduling Order and Joint Preliminary Report in bond matter.	0.30
09/17/14	MLB	ASSET ANALYSIS AND RECOVERY: Draft/revise conferral letter to Genworth, supplement with additional GA case law	2.50
09/18/14	JSM	ASSET ANALYSIS AND RECOVERY: Emails with proposed expert witness	0.10
09/18/14	JSM	ASSET ANALYSIS AND RECOVERY: Emails with CDS, Ms. Davis, and Mr. Banez re: draft demand letter	0.10
09/18/14	JSM	ASSET ANALYSIS AND RECOVERY: Emails from Ms. Visconti and CDS re: Grossman and Carey Complaint	0.10
09/18/14	KMS	ASSET ANALYSIS AND RECOVERY: Review and organize documents produced by life insurers	1.60
09/18/14	CDS	ASSET ANALYSIS AND RECOVERY: Review notes regarding financials needed to provide to St. Paul in connection with bond demand letter; draft email to Ms. Davis	0.20

PLEASE INCLUDE INVOICE NUMBER 12544 WITH YOUR PAYMENT. THANK YOU.

		regarding same.	
09/18/14	CDS	ASSET ANALYSIS AND RECOVERY: Review final drafts of Scheduling Order and Joint Preliminary Report for filing by carrier.	0.20
09/18/14	CDS	ASSET ANALYSIS AND RECOVERY: Review final draft of letter to carrier addressing timeliness of claims and D&O complaint; draft e-mail to LMP regarding same.	0.20
09/18/14	CDS	ASSET ANALYSIS AND RECOVERY: Review/analyze St. Paul's response to motion to dismiss filed by FDIC-R in bond action.	0.70
09/18/14	MLB	ASSET ANALYSIS AND RECOVERY: Plan and prepare for, hold telephone conference with Household/Protective's counsel re: discovery and settlement	0.40
09/19/14	JSM	ASSET ANALYSIS AND RECOVERY: Emails with MLB re: expert witness	0.10
09/19/14	JSM	ASSET ANALYSIS AND RECOVERY: Email from Mr. Lichtman advising of phone call from court regarding proposed scheduling order and FDIC's disagreement as to dates	0.10
09/19/14	JSM	ASSET ANALYSIS AND RECOVERY: Emails with CDS re: [REDACTED]	0.10
09/19/14	JSM	ASSET ANALYSIS AND RECOVERY: Email from MLB to opposing counsel re: settlement offer	0.10
09/19/14	JSM	ASSET ANALYSIS AND RECOVERY: Email from MLB to Mr. Feinberg re: confidentiality agreement and Receiver's supplemental production	0.10
09/19/14	CDS	ASSET ANALYSIS AND RECOVERY: Receive and review email regarding financials needed to provide to bond carrier; draft response to same.	0.10
09/19/14	CDS	ASSET ANALYSIS AND RECOVERY: Draft comprehensive demand letter to carrier regarding bond.	0.40
09/19/14	CDS	ASSET ANALYSIS AND RECOVERY: Receive and review FDIC's e-mail to Court regarding scheduling order and e-mail to Receiver explaining same.	0.10
09/19/14	MLB	ASSET ANALYSIS AND RECOVERY: Telephone conference with Genworth's counsel re: discovery conferral, settlement offer	0.10
09/19/14	MLB	ASSET ANALYSIS AND RECOVERY: Telephone conference with potential expert witness	0.10
09/19/14	MLB	ASSET ANALYSIS AND RECOVERY: Plan and prepare outline of motion to compel re: Genworth, related document review	0.50
09/22/14	JSM	ASSET ANALYSIS AND RECOVERY: Email from Receiver's Counsel re: revised mutual release	0.10
09/22/14	JSM	ASSET ANALYSIS AND RECOVERY: Email from Ms. Banez re: Proof of Loss	0.10
09/22/14	JSM	Review scheduling order from Court	0.10
09/22/14	JSM	ASSET ANALYSIS AND RECOVERY: Email to Mr. Murena re: expert witness	0.10
09/22/14	JSM	Email from Mr. Murena re: scheduling order	0.10
09/22/14	KMS	ASSET ANALYSIS AND RECOVERY: Review local rules for Rule 26 deadlines and email CDS regarding same	0.20
09/22/14	KMS	ASSET ANALYSIS AND RECOVERY: Review Court's Scheduling Order	0.10
09/22/14	CDS	ASSET ANALYSIS AND RECOVERY: Draft/revise comprehensive demand letter to St. Paul regarding bond proceeds; review and analyze various financial analyses provided by Ms. Davis to provide to carrier.	4.60
09/22/14	MLB	ASSET ANALYSIS AND RECOVERY: Draft/revise motion to compel re: Genworth	2.90
09/22/14	MLB	ASSET ANALYSIS AND RECOVERY: Research and review of relevant case law for motion to compel re: Genworth	0.40
09/23/14	JSM	ASSET ANALYSIS AND RECOVERY: Email to Mr. Murena on bond	0.10
09/23/14	JSM	ASSET ANALYSIS AND RECOVERY: Email from Mr. Murena re: proof of loss statements, letter to carrier	0.10
09/23/14	JSM	ASSET ANALYSIS AND RECOVERY: Email from CDS re: phone conference with Mr. Carly	0.10
09/23/14	JSM	ASSET ANALYSIS AND RECOVERY: Email from CDS re: draft letter to carrier	0.10

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09/23/14	JSM	ASSET ANALYSIS AND RECOVERY: Trade emails with CDS regarding FDIC's bond claim	0.10
09/23/14	JSM	ASSET ANALYSIS AND RECOVERY: Read email from Mr. Ford regarding demand letter	0.10
09/23/14	JSM	ASSET ANALYSIS AND RECOVERY: Confer with MLB re: motion to compel, discovery plan	0.20
09/23/14	JSM	ASSET ANALYSIS AND RECOVERY: Read email from Ms. DeMoss re: Motion to Compel	0.10
09/23/14	JSM	ASSET ANALYSIS AND RECOVERY: Email from Mr. Murena re: correspondence between Receiver and counsel for Ms. Price	0.10
09/23/14	JSM	ASSET ANALYSIS AND RECOVERY: Email from MLB to Mr. Feinberg re: follow-up regarding confidentiality agreement and supplemental document production	0.10
09/23/14	JSM	ASSET ANALYSIS AND RECOVERY: Email to Mr. Murena re: confidentiality agreement	0.10
09/23/14	JSM	ASSET ANALYSIS AND RECOVERY: Email from Mr. Curley re: extension of time to file reply brief on motion to dismiss	0.10
09/23/14	JSM	ASSET ANALYSIS AND RECOVERY: Review emails for privilege selected by MLB.	0.20
09/23/14	CDS	ASSET ANALYSIS AND RECOVERY: Telephone conference with Mr. Curley regarding agreement to make joint demand, allocation of bond proceeds, and bond litigation with carrier; draft email to team regarding same.	0.60
09/23/14	CDS	ASSET ANALYSIS AND RECOVERY: Telephone conference with Ms. Banez regarding final form of financial charts for bond carrier.	0.40
09/23/14	CDS	ASSET ANALYSIS AND RECOVERY: Draft/revise comprehensive demand letter to bond carrier including additional financial information.	4.90
09/23/14	CDS	ASSET ANALYSIS AND RECOVERY: Receive and review additional financial information from Ms. Banez to provide to bond carrier.	0.40
09/23/14	MLB	ASSET ANALYSIS AND RECOVERY: Draft/revise revisions to motion to compel re: Genworth	2.40
09/23/14	MLB	ASSET ANALYSIS AND RECOVERY: Office conference with JSM re: case status update, necessary follow up	0.20
09/23/14	MLB	ASSET ANALYSIS AND RECOVERY: Additional research re: attorney client privilege and work product immunity in GA and federal law	1.50
09/23/14	MLB	ASSET ANALYSIS AND RECOVERY: Receive and review, trade email re: proposed confidentiality agreement	0.30
09/24/14	JSM	ASSET ANALYSIS AND RECOVERY: Exchange emails with Mr. Giberson and CDS re: draft demand letter to carrier on bond	0.10
09/24/14	JSM	ASSET ANALYSIS AND RECOVERY: Emails with Mr. Curly and CDS re: initial disclosures	0.10
09/24/14	JSM	ASSET ANALYSIS AND RECOVERY: Email from Mr. Murena re: estate expenditures on life insurance claims	0.10
09/24/14	KMS	ASSET ANALYSIS AND RECOVERY: Analyze Court's Scheduling Order and email team regarding deadlines set forth therein and other deadlines per local rules	0.20
09/24/14	KMS	Review emails with Receiver re: application process for Genworth, Athene, and HSBC; prepare responsive documents for production to carriers; confer with MLB regarding same ASSET ANALYSIS AND RECOVERY:	1.60
09/24/14	CDS	ASSET ANALYSIS AND RECOVERY: Receive and review various e-mails regarding deadline for Rule 26 disclosures; draft responses to same.	0.40
09/24/14	CDS	ASSET ANALYSIS AND RECOVERY: Draft e-mail to opposing counsel regarding Rule 26 disclosures.	0.10
09/24/14	CDS	ASSET ANALYSIS AND RECOVERY: Revise comprehensive demand letter to bond carrier in accordance with comments by Mr. Giberson.	0.20
09/24/14	CDS	ASSET ANALYSIS AND RECOVERY: Receive and review email regarding sharing	0.20

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		Receiver's bond forensics with FDIC; draft response to same.	
09/24/14	CDS	ASSET ANALYSIS AND RECOVERY: Review Mr. Giberson's comments to comprehensive demand letter; review proposed orders on extensions of time from carrier; draft email to opposing counsel regarding same; review local rule regarding Rule 26 disclosures.	0.50
09/24/14	MLB	ASSET ANALYSIS AND RECOVERY: Supplement research re: attorney client privilege and work product immunity under GA and federal law	1.40
09/24/14	MLB	ASSET ANALYSIS AND RECOVERY: Telephone conference, receive and return calls with Genworth's counsel re: motion to compel	0.20
09/24/14	MLB	ASSET ANALYSIS AND RECOVERY: Draft/revise motion to compel re: Genworth	1.60
09/24/14	MLB	ASSET ANALYSIS AND RECOVERY: Draft/revise trade email with client, opposing counsel, team re: confidentiality agreement, privilege log	1.00
09/25/14	JSM	ASSET ANALYSIS AND RECOVERY: Emails with Mr. Murena and CDS re: potential proposed release language	0.10
09/25/14	KMS	ASSET ANALYSIS AND RECOVERY: Review documents relating to HSBC and prepare privilege log for same	0.70
09/25/14	KMS	ASSET ANALYSIS AND RECOVERY: Review documents relating to Athene and prepare privilege log for same	1.30
09/25/14	KMS	ASSET ANALYSIS AND RECOVERY: Review Genworth documents and prepare privilege log for attorney client documents	1.20
09/25/14	KMS	ASSET ANALYSIS AND RECOVERY: Prepare communications between Receiver and Mr. Holt for production to opposing parties	0.90
09/26/14	JSM	ASSET ANALYSIS AND RECOVERY: Email to MLB with instructions re: Motion to Compel	0.10
09/26/14	JSM	ASSET ANALYSIS AND RECOVERY: Emails with Mr. Murena, MLB, and KMS re: logging of Receiver communications with VPL	0.10
09/26/14	JSM	ASSET ANALYSIS AND RECOVERY: Email to Receiver and her counsel re: mediation with FDIC	0.10
09/26/14	JSM	ASSET ANALYSIS AND RECOVERY: Email from Mr. Murena re: reconciliation for main receivership account	0.10
09/26/14	JSM	ASSET ANALYSIS AND RECOVERY: Emails with CDS re: strategy for joint demand with FDIC	0.10
09/26/14	CDS	ASSET ANALYSIS AND RECOVERY: Draft various emails to coordinate call on joint demand.	0.10
09/26/14	CDS	ASSET ANALYSIS AND RECOVERY: Draft email to JSM regarding potential allocation with FDIC to make joint demand.	0.10
09/26/14	MLB	ASSET ANALYSIS AND RECOVERY: Receive and review, trade email and phone calls with Genworth's counsel re: discovery conferrals, deposition scheduling, follow up re: same	0.60
09/26/14	MLB	ASSET ANALYSIS AND RECOVERY: Plan and prepare for, conduct telephone conference with Receiver re: discovery and action plan	0.40
09/29/14	JSM	ASSET ANALYSIS AND RECOVERY: Trade emails with Receiver for approval on joint demand.	0.10
09/29/14	JSM	ASSET ANALYSIS AND RECOVERY: Telephone conference with CDS regarding status of discussions with FDIC to make joint demand with Receiver	0.10
09/29/14	JSM	ASSET ANALYSIS AND RECOVERY: Email from Mr. Murena re: [REDACTED]	0.10
09/29/14	JSM	ASSET ANALYSIS AND RECOVERY: Emails with Receiver and CDS re: FDIC approval for joint demand to Travelers	0.10
09/29/14	JSM	ASSET ANALYSIS AND RECOVERY: Listen to voice mail from Ms. Damian regarding [REDACTED] and email CDS regarding same	0.10
09/29/14	JSM	ASSET ANALYSIS AND RECOVERY: Review proposed confidentiality agreement from	0.10

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		Genworth's counsel	
09/29/14	CDS	ASSET ANALYSIS AND RECOVERY: Telephone conference with JSM regarding status of discussions with FDIC over joint demand; leave message for Receiver regarding same.	0.20
09/29/14	CDS	ASSET ANALYSIS AND RECOVERY: Telephone conference with Mr. Curly regarding joint demand against St. Paul.	0.40
09/29/14	CDS	ASSET ANALYSIS AND RECOVERY: Draft email to Receiver regarding call with Mr. Curly and joint demand on bond carrier.	0.20
09/29/14	CDS	ASSET ANALYSIS AND RECOVERY: Revise comprehensive demand letter in light of JSM's comments and agreement to articulate joint demand with FDIC-R; draft e-mail to Mr. Curly regarding same.	2.00
09/29/14	MLB	ASSET ANALYSIS AND RECOVERY: Draft/revise damages summary for Receiver based upon data from client, reconciliations, payment proportions	1.20
09/29/14	MLB	ASSET ANALYSIS AND RECOVERY: Plan and prepare for discovery follow up with opposing counsel, draft notes re same, trade emails with counsel for all carriers	0.90
09/29/14	MLB	ASSET ANALYSIS AND RECOVERY: Draft/revise discovery outline	0.90
09/30/14	JSM	ASSET ANALYSIS AND RECOVERY: Email from Mr. Cuervo on confidentiality order for documents re: life insurance claim against Protective and HSBC	0.10
09/30/14	JSM	ASSET ANALYSIS AND RECOVERY: Emails with Ms. Davis re: expert witness services	0.10
09/30/14	JSM	ASSET ANALYSIS AND RECOVERY: Emails with Receiver and CDS re: service of D&O complaint against Manners	0.10
09/30/14	JSM	ASSET ANALYSIS AND RECOVERY: Emails with Receiver and CDS re: status of joint demand, Receiver's demand letter to carrier	0.10
09/30/14	KMS	ASSET ANALYSIS AND RECOVERY: Prepare Index to Genworth documents	1.20
09/30/14	KMS	ASSET ANALYSIS AND RECOVERY: Confer with MLB regarding expert and fact disclosures; prepare supplemental Rule 26 Disclosures	1.10
09/30/14	KMS	ASSET ANALYSIS AND RECOVERY: Review and organize documents produced by Genworth and Receiver; prepare same for transmittal to expert	2.60
09/30/14	CDS	ASSET ANALYSIS AND RECOVERY: Telephone conference with Mr. Curly regarding separate joint demand; draft email to team regarding same.	0.30
09/30/14	CDS	ASSET ANALYSIS AND RECOVERY: Receive and review e-mail from Ms. Visconti regarding serving D&O complaint; draft response to same.	0.10
09/30/14	CDS	ASSET ANALYSIS AND RECOVERY: Finalize comprehensive demand letter to carrier; draft/revise separate joint demand letter between Receiver and FDIC; review policy regarding additional coverage for costs associated in preparing claim.	2.00
09/30/14	MLB	ASSET ANALYSIS AND RECOVERY: Receive and review, revise confidentiality agreement from Genworth's counsel, follow up emails re: same	0.60
09/30/14	MLB	ASSET ANALYSIS AND RECOVERY: Receive and review emails re: fact witnesses, expert witnesses re: retentions, receive and review Rule 26 disclosures	1.10
09/30/14	MLB	ASSET ANALYSIS AND RECOVERY: Research re: [REDACTED]	2.30

Timekeeper

	Hours	Rate	Amount
Steklof, Cary D.	49.30	250.00	\$12,325.00
Mazer, Jason S.	12.80	565.00	\$4,709.50
Shaw, Kathleen M.	12.80	235.00	\$3,008.00
Baldwin, Matthew L	38.80	260.00	\$10,088.00
Total fees for this matter	113.70 hrs.		\$30,130.50

DISBURSEMENTS

PLEASE INCLUDE INVOICE NUMBER 12559 WITH YOUR PAYMENT. THANK YOU.

Jason Mazer; Out-of-town Travel to Atlanta w/Receiver for meetings with Travelers	771.31
West Payment Center; Online Research; services through Aug 31, 2014	70.01
Color Photocopies	21.00
Photocopies	181.50

Total disbursements for this matter	\$1,043.82
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BILLING SUMMARY

TOTAL FEES	\$30,130.50
TOTAL DISBURSEMENTS	\$1,043.82

TOTAL CHARGES FOR THIS BILL	\$31,174.32

Ver Ploeg & Lumpkin, P.A.

100 S.E. Second Street, 30th Floor
Miami, Florida 33131-2151
305.577.3996: TEL
305.577.3558: FAX

Tax ID #65-0615033

November 17, 2014

Melanie E. Damian, Esq.
Damian Valori, LLP
as Receiver for Aubrey Lee Price
1000 Brickell Avenue
Suite 1020
Miami, FL 33131

Billing through 10/31/14
Invoice Number 12545
Account Number D032-00100

Damian, Melanie E. Esq. - Aubrey Lee Price

FOR PROFESSIONAL SERVICES RENDERED

10/01/14	JSM	ASSET ANALYSIS AND RECOVERY: Email from Mr. Cuervo re: proposed Order on Stipulation of Confidentiality	0.10
10/01/14	JSM	ASSET ANALYSIS AND RECOVERY: Email from Mr. Murena re: communication from counsel for Mr. Manners	0.10
10/01/14	JSM	ASSET ANALYSIS AND RECOVERY: Email from CDS to Mr. Murena re: [REDACTED]	0.10
10/01/14	KMS	ASSET ANALYSIS AND RECOVERY: Work on timeline for depositions and use during possible settlement discussions	0.40
10/01/14	KMS	ASSET ANALYSIS AND RECOVERY: Review and index documents relating to bond action	0.20
10/01/14	MLB	ASSET ANALYSIS AND RECOVERY: Research re: [REDACTED]	3.20
10/01/14	MLB	ASSET ANALYSIS AND RECOVERY: Review and annotate research re: [REDACTED]	3.10
10/01/14	MLB	ASSET ANALYSIS AND RECOVERY: Telephone conference with opposing counsel re: outstanding discovery issues	0.10
10/01/14	MLB	ASSET ANALYSIS AND RECOVERY: Telephone conference with expert witness	0.10
10/02/14	MLB	ASSET ANALYSIS AND RECOVERY: Review and annotate compiled research re: [REDACTED]	6.30
10/03/14	JSM	ASSET ANALYSIS AND RECOVERY: Email from CDS to Mr. Curly re: joint demand; email from Mr. Curly regarding same	0.10
10/03/14	CDS	ASSET ANALYSIS AND RECOVERY: Receive and review answer and affirmative defenses to Receiver's counterclaim under PFGBI bond.	0.20
10/03/14	MLB	ASSET ANALYSIS AND RECOVERY: Receive and review correspondence from carrier re: discovery issues, return calls re: same and draft action plan re: same	0.90
10/03/14	MLB	ASSET ANALYSIS AND RECOVERY: Telephone conference with Receiver re: status plan, proposed action plan	0.20
10/03/14	MLB	ASSET ANALYSIS AND RECOVERY: Plan and prepare action plan re: Monday discovery issues	0.70
10/03/14	MLB	ASSET ANALYSIS AND RECOVERY: Trade messages and hold telephone conference with Genworth's counsel re: discovery issues	0.20
10/06/14	JSM	ASSET ANALYSIS AND RECOVERY: Review transmittal of FDIC's Motion to Dismiss	0.10

PLEASE INCLUDE INVOICE NUMBER 12545 WITH YOUR PAYMENT. THANK YOU.

		Counterclaim	
10/06/14	JSM	ASSET ANALYSIS AND RECOVERY: Emails from Mr. Kitchen re: discovery issues	0.10
10/06/14	JSM	ASSET ANALYSIS AND RECOVERY: Review emails between MLB and Mr. Cuervo re: deposition topics, Receiver's request for admissions	0.10
10/06/14	KMS	ASSET ANALYSIS AND RECOVERY: Organize materials received from Protective and HSBC; confer with MLB regarding same	1.20
10/06/14	KMS	ASSET ANALYSIS AND RECOVERY: Prepare email to Mr. Dinsmore with additional documents for review	0.20
10/06/14	CDS	ASSET ANALYSIS AND RECOVERY: Receive and review St. Paul's response in opposition to motion to stay discovery.	0.50
10/06/14	MLB	ASSET ANALYSIS AND RECOVERY: Draft/revise memo to clerk re: discovery dispute, correspond with Receiver re: same	2.30
10/06/14	MLB	ASSET ANALYSIS AND RECOVERY: Draft/revise outline for expert witness preparation	2.60
10/06/14	MLB	ASSET ANALYSIS AND RECOVERY: Telephone conference with opposing counsel re: discovery disputes	0.30
10/06/14	MLB	ASSET ANALYSIS AND RECOVERY: Telephone conference with Receiver re: discovery disputes, related follow up	0.50
10/06/14	MLB	ASSET ANALYSIS AND RECOVERY: Receive and review initial and supplemental document productions re: TBA court conference call	1.90
10/07/14	JSM	ASSET ANALYSIS AND RECOVERY: Emails with MLB and KMS on Protective's and HSBC's discovery responses, depositions.	0.10
10/07/14	JSM	ASSET ANALYSIS AND RECOVERY: Emails with MLB and KMS re: discovery and expert reports	0.10
10/07/14	JSM	ASSET ANALYSIS AND RECOVERY: Review emails with court and opposing counsel re: discovery and dispute over depositions	0.10
10/07/14	KMS	ASSET ANALYSIS AND RECOVERY: Review emails relating to discovery disputes and carriers' refusal to provide deposition dates; confer with MLB regarding same	0.40
10/07/14	MLB	ASSET ANALYSIS AND RECOVERY: Receive and review, trade emails with JSM re: discovery disputes, [REDACTED] follow up re: same	0.30
10/07/14	MLB	ASSET ANALYSIS AND RECOVERY: Receive and review Genworth supplemental document production, make notes for depositions re: same	3.10
10/07/14	MLB	ASSET ANALYSIS AND RECOVERY: Plan and prepare for motions for summary judgment, draft outline re: same	1.40
10/08/14	JSM	ASSET ANALYSIS AND RECOVERY: Email from Mr. Cuervo re: Genworth's discovery	0.10
10/08/14	JSM	ASSET ANALYSIS AND RECOVERY: Emails with MLB re: parameters for acceptable settlement	0.10
10/08/14	JSM	ASSET ANALYSIS AND RECOVERY: Email from Mr. Cuervo re: deposition of Receiver	0.10
10/08/14	JSM	ASSET ANALYSIS AND RECOVERY: Exchange emails with MLB and KMS regarding life carriers' responses to Receiver's request for production, expert reports	0.20
10/08/14	JSM	ASSET ANALYSIS AND RECOVERY: Email to MLB re: expert report on financial status of Receiver's accounts	0.10
10/08/14	KMS	ASSET ANALYSIS AND RECOVERY: Prepare working copy of Genworth documents for deposition outline and prep with Receiver	2.20
10/08/14	KMS	ASSET ANALYSIS AND RECOVERY: Prepare working set of Protective documents for deposition outline	1.10
10/08/14	KMS	ASSET ANALYSIS AND RECOVERY: Prepare working set of HSBC documents for deposition outline and depo prep with Receiver	1.20
10/08/14	MLB	ASSET ANALYSIS AND RECOVERY: Receive and review, draft, trade email with opposing counsel re: document production issues	1.80
10/08/14	MLB	ASSET ANALYSIS AND RECOVERY: Draft/revise, trade email with JSM and Receiver	0.30

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		re: settlement, discovery, deposition dates	
10/08/14	MLB	ASSET ANALYSIS AND RECOVERY: Draft/revise outline for motions for summary judgment	1.60
10/09/14	JSM	ASSET ANALYSIS AND RECOVERY: Read email from MLB [REDACTED]	0.10
10/09/14	JSM	ASSET ANALYSIS AND RECOVERY: Emails to MLB re: discovery from carriers, strategy going forward	0.10
10/09/14	JSM	ASSET ANALYSIS AND RECOVERY: Phone call with MLB re: order from Judge Batten and next steps	0.20
10/09/14	JSM	ASSET ANALYSIS AND RECOVERY: Email to MLB with direction re: life carrier depositions	0.10
10/09/14	JSM	ASSET ANALYSIS AND RECOVERY: Review letter from Mr. Kitchen re: discovery	0.10
10/09/14	JSM	ASSET ANALYSIS AND RECOVERY: Review letter from Mr. Cuervo re: discovery	0.10
10/09/14	JSM	ASSET ANALYSIS AND RECOVERY: Phone conference with MLB re: further direction for supplemental correspondence to court	0.30
10/09/14	JSM	ASSET ANALYSIS AND RECOVERY: Emails with MLB re: remedies regarding Judge Batten's ruling on discovery	0.10
10/09/14	JSM	ASSET ANALYSIS AND RECOVERY: Read email from Judge Batten re: discovery	0.10
10/09/14	CDS	ASSET ANALYSIS AND RECOVERY: Receive and review e-mail from KMS regarding Rule 26 disclosures; draft e-mail regarding same.	0.10
10/09/14	MLB	ASSET ANALYSIS AND RECOVERY: Research re: [REDACTED]	3.30
10/09/14	MLB	ASSET ANALYSIS AND RECOVERY: Research re: [REDACTED]	1.90
10/09/14	MLB	ASSET ANALYSIS AND RECOVERY: Telephone conference with JSM re: discovery dispute	0.20
10/09/14	MLB	ASSET ANALYSIS AND RECOVERY: Plan and prepare outline of letter to carriers re: discovery prior to Court's intervention	2.10
10/10/14	JSM	ASSET ANALYSIS AND RECOVERY: Read follow-up email to Court; email MLB regarding same	0.10
10/10/14	JSM	ASSET ANALYSIS AND RECOVERY: Read follow-up ruling from Judge Batten	0.10
10/10/14	JSM	ASSET ANALYSIS AND RECOVERY: Emails with Receiver and MLB re: Judge Batten's rulings	0.10
10/10/14	JSM	ASSET ANALYSIS AND RECOVERY: Emails from Mr. Giberson re: [REDACTED] follow-up emails with MLB regarding same	0.20
10/10/14	JSM	ASSET ANALYSIS AND RECOVERY: Bond - Emails with CDS and KMS, follow-up to Mr. Murena re: Rule 26 disclosures	0.10
10/10/14	KMS	ASSET ANALYSIS AND RECOVERY: Further review and analysis of documents produced by Genworth, Protective, and HSBC and note deficiencies for follow-up with Court	1.30
10/10/14	KMS	ASSET ANALYSIS AND RECOVERY: Review correspondence relating to bond action for initial Rule 26 disclosures	1.10
10/10/14	KMS	ASSET ANALYSIS AND RECOVERY: Confer with MLB and review court's follow-up rulings	0.20
10/10/14	KMS	ASSET ANALYSIS AND RECOVERY: Bond - emails with CDS regarding Rule 26 disclosures; following up with Mr. Murena regarding same	0.10
10/10/14	CDS	ASSET ANALYSIS AND RECOVERY: Office conference with KMS regarding Rule 26 disclosures; draft correspondence to co-counsel regarding same.	0.20
10/10/14	MLB	ASSET ANALYSIS AND RECOVERY: Draft/revise follow up email to court re: discovery dispute, confer with JSM and Receiver re: same	1.50
10/10/14	MLB	ASSET ANALYSIS AND RECOVERY: Research re: deposition case law re: response to Genworth's letter	2.70

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10/12/14	JSM	ASSET ANALYSIS AND RECOVERY: Email from MLB re: Court's ruling, scheduling of depositions	0.10
10/12/14	JSM	ASSET ANALYSIS AND RECOVERY: EMail with MLB and KMS re: need for oral argument on areas remaining in dispute, discovery issues	0.10
10/13/14	JSM	ASSET ANALYSIS AND RECOVERY: Emails with MLB re: discovery of carrier claim files	0.10
10/13/14	JSM	ASSET ANALYSIS AND RECOVERY: Emails with MLB re: deposition of Genworth	0.10
10/13/14	JSM	ASSET ANALYSIS AND RECOVERY: Read emails with Mr. Cuervo re: depositions of Genworth and Receiver	0.10
10/13/14	JSM	ASSET ANALYSIS AND RECOVERY: Email from Mr. Kitchen re: depositions and discovery; provide MLB with direction as to how to respond	0.10
10/13/14	KMS	ASSET ANALYSIS AND RECOVERY: Review documents provided by Mr. Murena re: [REDACTED]	0.60
10/13/14	KMS	ASSET ANALYSIS AND RECOVERY: Prepare summary of facts for upcoming depositions of Genworth, Protective, and HSBC	2.40
10/13/14	MLB	ASSET ANALYSIS AND RECOVERY: Draft/revise response to Genworth's discovery letter, review of related case law	4.90
10/13/14	MLB	ASSET ANALYSIS AND RECOVERY: Draft/revise trade email with JSM, opposing counsel re: discovery disputes, deposition scheduling, document productions	0.50
10/14/14	JSM	ASSET ANALYSIS AND RECOVERY: Emails with MLB re: response to Mr. Cuervo's additional inquiry to Judge Batten	0.10
10/14/14	JSM	ASSET ANALYSIS AND RECOVERY: Read email from Mr. Cuervo to Ms. Smiley requesting a status conference with Judge Batten	0.10
10/14/14	JSM	ASSET ANALYSIS AND RECOVERY: Email from Julie Smiley, Judge Batten's law clerk, in response to Mr. Cuervo's communication	0.10
10/14/14	JSM	ASSET ANALYSIS AND RECOVERY: Emails with MLB on depositions and carrier's refusal to cooperate in deposition process	0.10
10/14/14	KMS	ASSET ANALYSIS AND RECOVERY: Confer with MLB on carriers' positions re: discovery	0.20
10/14/14	MLB	ASSET ANALYSIS AND RECOVERY: Draft/revise response to carriers' discovery email to court, confer with team re: same	2.70
10/14/14	MLB	ASSET ANALYSIS AND RECOVERY: Plan and prepare outline re: research for summary judgment	2.80
10/15/14	JSM	ASSET ANALYSIS AND RECOVERY: Emails with Mr. Murena, Mr. Giberson, and MLB re: response to carriers' most recent submittal to Judge Batten	0.10
10/15/14	JSM	ASSET ANALYSIS AND RECOVERY: Review Genworth's objections to Receiver's Notice of Taking 30(b)(6) deposition	0.10
10/15/14	JSM	ASSET ANALYSIS AND RECOVERY: Review Genworth's objections to Receiver's Notice of Taking Deposition	0.10
10/15/14	JSM	ASSET ANALYSIS AND RECOVERY: Email to MLB re: revisions to draft response to Mr. Cuervo's additional inquiry to Judge Batten	0.10
10/15/14	KMS	ASSET ANALYSIS AND RECOVERY: BOND - Review Receiver's file with respect to the Bond claim; draft initial Rule 26 Disclosures	3.40
10/15/14	CDS	ASSET ANALYSIS AND RECOVERY: Office conference with KMS regarding issues with Receiver's Rule 26 disclosures; review St. Paul's Rule 26 disclosures; review and revise draft of Receiver's Rule 26 disclosures.	1.90
10/15/14	MLB	ASSET ANALYSIS AND RECOVERY: Telephone conference with Receiver re: discovery disputes	0.20
10/15/14	MLB	ASSET ANALYSIS AND RECOVERY: Draft/revise motion for extension of discovery period	1.50
10/16/14	JSM	ASSET ANALYSIS AND RECOVERY: Review [REDACTED] confer with MLB re: [REDACTED]	0.70

10/16/14	JSM	ASSET ANALYSIS AND RECOVERY: Trade emails with Mr Giberson re: status of deal with FDIC in order to make joint demand on carriers.	0.10
10/16/14	JSM	ASSET ANALYSIS AND RECOVERY: Revise email to judge, motion to judge and letter re: discovery (.5); meet with MLB re: same, next steps and depo areas.	1.00
10/16/14	JSM	ASSET ANALYSIS AND RECOVERY: Email from Mr. Murena re: submission of motion to dismiss to Judge Batten	0.10
10/16/14	JSM	ASSET ANALYSIS AND RECOVERY: Confer with JSM on responses to FDIC's Motion to Dismiss and Motion to Strike Affirmative Defenses	0.10
10/16/14	JSM	ASSET ANALYSIS AND RECOVERY: Emails with CDS regarding extension of time to respond to FDIC's Motion to Dismiss Counterclaim	0.10
10/16/14	JSM	ASSET ANALYSIS AND RECOVERY: Emails with CDS re: motion to strike St. Paul's affirmative defenses	0.10
10/16/14	JSM	ASSET ANALYSIS AND RECOVERY: Read email from Mr. Namrata re: additional correspondence to Judge Batten on discovery matters	0.10
10/16/14	JSM	ASSET ANALYSIS AND RECOVERY: Additional emails with Mr. Murena and MLB re: hearing before Judge Batten on discovery matters, extension of discovery deadlines, and response to Genworth's discovery letter	0.10
10/16/14	JSM	ASSET ANALYSIS AND RECOVERY: Exchange emails with MLB re: carriers' discovery position	0.10
10/16/14	JSM	ASSET ANALYSIS AND RECOVERY: Emails with Mr. Murena and MLB re: [REDACTED]	0.10
10/16/14	JSM	ASSET ANALYSIS AND RECOVERY: Review email from Ms. Davis re: [REDACTED]	0.10
10/16/14	KMS	ASSET ANALYSIS AND RECOVERY: Confer with CDS regarding docket items and conflict between local rule and Federal rule with respect to deadline to strike affirmative defenses; review court's standing pretrial order	0.20
10/16/14	KMS	ASSET ANALYSIS AND RECOVERY: Emails with JSM and CDS re: response to FDIC's Motion to Dismiss	0.10
10/16/14	KMS	ASSET ANALYSIS AND RECOVERY: Check local rules for deadlines to file response to Motion to Dismiss	0.10
10/16/14	KMS	ASSET ANALYSIS AND RECOVERY: Review filings in the SEC case and print same for review by attorneys	0.50
10/16/14	CDS	ASSET ANALYSIS AND RECOVERY: Office conference with JSM regarding case status and next steps.	0.10
10/16/14	CDS	ASSET ANALYSIS AND RECOVERY: Draft/revise e-mail to Receiver regarding status of deal with FDIC for joint demand.	0.10
10/16/14	CDS	ASSET ANALYSIS AND RECOVERY: Receive and review Mr. Murena's redlines to Rule 26 disclosures; receive and review e-mail regarding motion to strike; draft various e-mail to JSM and KMS regarding same.	0.30
10/16/14	CDS	ASSET ANALYSIS AND RECOVERY: Draft e-mail to JSM regarding case status and next steps regarding bond and D&O litigation.	0.20
10/16/14	CDS	ASSET ANALYSIS AND RECOVERY: Receive and review FDIC-R's motion to dismiss Receiver's counterclaim; office conference with KMS regarding same; draft various e-mail correspondence with Mr. Murena regarding same; draft e-mail to Mr. Carly to obtain extension of time.	0.40
10/16/14	MLB	ASSET ANALYSIS AND RECOVERY: Office conference with JSM re: discovery disputes, action plan	0.50
10/16/14	MLB	ASSET ANALYSIS AND RECOVERY: Draft/revise motion for extension of discovery per JSM	3.20
10/16/14	MLB	ASSET ANALYSIS AND RECOVERY: Draft/revise revisions to discovery conferral letter, email to Receiver re: same	1.10
10/16/14	MLB	ASSET ANALYSIS AND RECOVERY: Receive and review incoming carrier responses re: discovery disputes, trade email with Receiver, JSM re: same	0.80

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10/16/14	MLB	ASSET ANALYSIS AND RECOVERY: Telephone conference with expert witness re: [REDACTED]	0.80
10/17/14	JSM	ASSET ANALYSIS AND RECOVERY: Email from Ms. Smilley re: hearing on discovery issues	0.10
10/17/14	JSM	ASSET ANALYSIS AND RECOVERY: Review letter from Chubb in response to the Receiver's correspondence dated September 18, 2014	0.10
10/17/14	JSM	ASSET ANALYSIS AND RECOVERY: Emails with CDS and KMS re: Initial Rule 26 Disclosures	0.10
10/17/14	JSM	ASSET ANALYSIS AND RECOVERY: Read emails relating to [REDACTED]	0.10
10/17/14	JSM	ASSET ANALYSIS AND RECOVERY: Emails with CDS re: deadline to file motion to strike affirmative defenses	0.10
10/17/14	JSM	ASSET ANALYSIS AND RECOVERY: Emails from Receiver and her counsel re: FDIC's Motion to Dismiss Counterclaim	0.10
10/17/14	JSM	ASSET ANALYSIS AND RECOVERY: Read email from Judge's clerk; trade emails with Receiver re: same and confer with MLB re: materials needed for hearing; read all follow up emails.	0.50
10/17/14	JSM	ASSET ANALYSIS AND RECOVERY: Phone conf with Receiver re: hearing.	0.40
10/17/14	JSM	ASSET ANALYSIS AND RECOVERY: Review notice from Judge Batten scheduling hearing	0.10
10/17/14	JSM	ASSET ANALYSIS AND RECOVERY: Confer with CDS re: strategy relative to FDIC, responses and extension requests	0.20
10/17/14	KMS	ASSET ANALYSIS AND RECOVERY: Confer with CDS on Motion to Strike St. Paul's Affirmative Defenses	0.20
10/17/14	KMS	ASSET ANALYSIS AND RECOVERY: Confer with CDS on motions for extension of time to reply to FDIC's Motion to Dismiss Counterclaim and to strike affirmative defenses	0.10
10/17/14	KMS	ASSET ANALYSIS AND RECOVERY: Prepare Disclosure of Interested Parties; email Mr. Murena regarding same	0.30
10/17/14	CDS	ASSET ANALYSIS AND RECOVERY: Telephone conference with opposing counsel regarding extension to respond to motion to dismiss; draft email to team regarding same.	0.30
10/17/14	CDS	ASSET ANALYSIS AND RECOVERY: Research primary resources regarding standard on motion to strike affirmative defenses.	1.50
10/17/14	CDS	ASSET ANALYSIS AND RECOVERY: Draft/revise motion regarding enlargement of time to strike St. Paul's affirmative defenses and proposed order; office conference with JSM regarding same.	1.80
10/17/14	CDS	ASSET ANALYSIS AND RECOVERY: Draft/revise motion to enlarge time to respond to FDIC-R's motion to dismiss and proposed order.	1.60
10/17/14	CDS	ASSET ANALYSIS AND RECOVERY: Review/revise certificate of interested persons.	0.20
10/17/14	CDS	ASSET ANALYSIS AND RECOVERY: Telephone conference with St. Paul's counsel regarding issues with affirmative defenses and extension of time to strike same.	0.30
10/17/14	CDS	ASSET ANALYSIS AND RECOVERY: Telephone conference with Mr. Martin regarding final approval to file motion for enlargement of time on response to motion to dismiss; draft email to co-counsel regarding same.	0.20
10/17/14	MLB	ASSET ANALYSIS AND RECOVERY: Draft/revise outline and summary of issues re: Tuesday's status conference	5.10
10/18/14	JSM	ASSET ANALYSIS AND RECOVERY: Emails with MLB re: [REDACTED]	0.10
10/18/14	MLB	ASSET ANALYSIS AND RECOVERY: Draft/revise, trade email with JSM, prepare notes re: damages, discovery supplemental issues for JSM	1.40
10/20/14	JSM	ASSET ANALYSIS AND RECOVERY: Review Court's Order Granting PFGBI's Motion for Extension of Time to Strike Affirmative Defenses	0.10

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10/20/14	JSM	ASSET ANALYSIS AND RECOVERY: Confer with CDS re: cost effective way to obviate motion to strike Aff defenses.	0.10
10/20/14	JSM	ASSET ANALYSIS AND RECOVERY: Trade emails with receiver re: various discovery issues.	0.30
10/20/14	JSM	ASSET ANALYSIS AND RECOVERY: Additional emails from Ms. Smiley, Judge Batten's clerk; trade emails with MLB and Mr. Murena in follow-up to Genworth's additional submittal;	0.30
10/20/14	JSM	ASSET ANALYSIS AND RECOVERY: Emails with MLB re: [REDACTED]	0.10
10/20/14	JSM	ASSET ANALYSIS AND RECOVERY: Read emails between CDS and Mr. Lichtman re: Receiver's Intention to strike affirmative defenses 1, 2, 3, 6, 9, 10, 11, and 18	0.10
10/20/14	JSM	ASSET ANALYSIS AND RECOVERY: Travel to Atlanta for hearing before Judge Batten and begin preparations en route by reviewing pleadings and emails to court and memo from MLB.	4.00
10/20/14	KMS	ASSET ANALYSIS AND RECOVERY: Finalize Initial Rule 26 Disclosures for service on opposing counsel	0.30
10/20/14	KMS	ASSET ANALYSIS AND RECOVERY: Update hearing notebook with additional materials; confer with JSM regarding same	1.30
10/20/14	KMS	ASSET ANALYSIS AND RECOVERY: Read and respond to emails from JSM re: discovery issues with carriers	0.20
10/20/14	KMS	ASSET ANALYSIS AND RECOVERY: Prepare caselaw in support of Receiver's position re: discovery issues	0.50
10/20/14	KMS	ASSET ANALYSIS AND RECOVERY: Review case correspondence and prepare updated notebook for discovery hearing	1.20
10/20/14	CDS	ASSET ANALYSIS AND RECOVERY: Receive and review e-mail from Mr. Lichtman regarding extension of time to strike affirmative defenses; draft revisions and responsive e-mail to same.	0.70
10/20/14	CDS	ASSET ANALYSIS AND RECOVERY: Draft e-mail to opposing counsel confirming willingness to continue discussions on motion to strike affirmative defenses.	0.20
10/20/14	CDS	ASSET ANALYSIS AND RECOVERY: Telephone conference with opposing counsel regarding issues with affirmative defenses in bond litigation; office conference with JSM regarding resolving same without motion practice.	0.50
10/20/14	CDS	ASSET ANALYSIS AND RECOVERY: Research primary resources regarding standard to strike affirmative defenses in Georgia.	2.30
10/20/14	MLB	ASSET ANALYSIS AND RECOVERY: Draft/revise, finalize response letter to Genworth	1.20
10/20/14	MLB	ASSET ANALYSIS AND RECOVERY: Draft/revise, trade email with Deputy Clerk and carriers re: discovery documents, compile documents re: same	1.60
10/20/14	MLB	ASSET ANALYSIS AND RECOVERY: Telephone conference with expert witness Dinsmore	0.50
10/20/14	MLB	ASSET ANALYSIS AND RECOVERY: Draft/revise supplemental Genworth discovery outline, related materials for JSM	3.60
10/21/14	JSM	ASSET ANALYSIS AND RECOVERY: Review Order on discovery hearing	0.10
10/21/14	JSM	ASSET ANALYSIS AND RECOVERY: Read case law in prep for hearing before Judge Batten and confer with Receiver re: argument; draft oral argument outline; attend hearing and confer with opposing counsel before and after re: discovery issues and settlement negotiations; return to Miami following same.	8.00
10/21/14	JSM	ASSET ANALYSIS AND RECOVERY: Email to MLB re: court's rulings on discovery	0.10
10/21/14	JSM	ASSET ANALYSIS AND RECOVERY: Emails with MLB and KMS in preparation for hearing re: caselaw, stipulated facts	0.20
10/21/14	JSM	ASSET ANALYSIS AND RECOVERY: Email to Mr. Kitchen and Mr. Cuervo in follow-up to hearing, Receiver's deposition	0.10

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10/21/14	JSM	ASSET ANALYSIS AND RECOVERY: Bond - read summary update on status of negotiations with FDIC and response to FDIC's Motion to Dismiss Receiver's Counterclaim	0.10
10/21/14	JSM	ASSET ANALYSIS AND RECOVERY: Bond - Telephone conference with CDS regarding finalizing deal with FDIC and making joint demand	0.10
10/21/14	CDS	ASSET ANALYSIS AND RECOVERY: Telephone conference with JSM regarding finalizing deal with FDIC and making joint demand.	0.10
10/21/14	CDS	ASSET ANALYSIS AND RECOVERY: Receive and review St. Paul's proposed unopposed motion and order on extension of time to strike affirmative defenses; draft e-mail to opposing counsel regarding same.	0.20
10/21/14	MLB	ASSET ANALYSIS AND RECOVERY: Plan and prepare for outline for motion for summary judgment	2.50
10/22/14	JSM	ASSET ANALYSIS AND RECOVERY: Confer with MLB re: terms of stipulation, next steps and settlement discussions with OC.	0.30
10/22/14	JSM	ASSET ANALYSIS AND RECOVERY: Emails re: agreement on additional extension of time to strike affirmative defenses	0.10
10/22/14	JSM	ASSET ANALYSIS AND RECOVERY: Emails with Mr. Murena and CDS re: settlement with FDIC	0.10
10/22/14	JSM	ASSET ANALYSIS AND RECOVERY: Bond - Read communications to Mr. Lichtman and Ms. Glasgow from CDS re: affirmative defenses	0.10
10/22/14	KMS	ASSET ANALYSIS AND RECOVERY: Confer with JSM re: discovery hearing; review application to be admitted pro hac vice in Bond matter	0.10
10/22/14	KMS	ASSET ANALYSIS AND RECOVERY: Calendar deadlines for pretrial submissions, motions, and pretrial order in accordance with new discovery deadline ordered by the Court	0.20
10/22/14	KMS	ASSET ANALYSIS AND RECOVERY: Bond - prepare key player list and list of documents for Receiver's First Request for Production to St. Paul	0.80
10/22/14	KMS	ASSET ANALYSIS AND RECOVERY: Bond - analyze and prepare documents for Rule 26 production	0.80
10/22/14	CDS	ASSET ANALYSIS AND RECOVERY: Telephone conference with Mr. Murena regarding response to St. Paul's motion to dismiss Receiver's counterclaim in bond matter.	0.10
10/22/14	MLB	ASSET ANALYSIS AND RECOVERY: Telephone conference with expert witnesses: re hearing	0.20
10/22/14	MLB	ASSET ANALYSIS AND RECOVERY: Plan and prepare for follow up with carriers per e-mails, confer with JSM re: hearing and same	0.40
10/23/14	JSM	ASSET ANALYSIS AND RECOVERY: Office conference with JSM regarding status of joint demands in bond and D&O policies	0.20
10/23/14	JSM	ASSET ANALYSIS AND RECOVERY: Bond - office conference with CDS regarding status of joint demand in bond and D&O policies	0.10
10/23/14	JSM	ASSET ANALYSIS AND RECOVERY: Review [REDACTED]	0.10
10/23/14	JSM	ASSET ANALYSIS AND RECOVERY: Emails with Mr. Curley and CDS regarding joint demand letter	0.10
10/23/14	JSM	ASSET ANALYSIS AND RECOVERY: Read email to Mr. Curley re: joint demand on the bond; exchange emails with CDS regarding same	0.10
10/23/14	JSM	ASSET ANALYSIS AND RECOVERY: Review Order Granting FDIC's Motion to Stay Proceedings, including discovery unrelated to FDIC's Motion to Dismiss	0.10
10/23/14	JSM	ASSET ANALYSIS AND RECOVERY: Read follow-up emails with Mr. Lichtman, Ms. Glasgow, and CDS re: extension of time to strike affirmative defenses	0.10
10/23/14	JSM	ASSET ANALYSIS AND RECOVERY: Exchange emails with CDS re: effect of Order directing stay	0.10
10/23/14	JSM	ASSET ANALYSIS AND RECOVERY: Read Court order staying proceedings in bond	0.20

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		case; trade emails with CDS re: same.	
10/23/14	JSM	ASSET ANALYSIS AND RECOVERY: Email from CDS to Mr. Curley re: demand letter	0.10
10/23/14	CDS	ASSET ANALYSIS AND RECOVERY: Draft e-mail to Mr. Curly regarding finalizing joint demand letters to carrier on bond.	0.20
10/23/14	CDS	ASSET ANALYSIS AND RECOVERY: Review/analyze bond language regarding claim and audit coverage for potential inclusion in joint demand.	0.60
10/23/14	CDS	ASSET ANALYSIS AND RECOVERY: Receive and review motion to stay bond discovery and orders regarding same and deadline to strike affirmative defenses; draft various e-mails to JSM regarding same.	0.50
10/23/14	CDS	ASSET ANALYSIS AND RECOVERY: Office conference with JSM regarding status of joint demands on bond and D&O policy.	0.20
10/23/14	CDS	ASSET ANALYSIS AND RECOVERY: Telephone conference with counsel to St. Paul regarding amendments to affirmative defenses in light of Court's stay order; office conference with JSM regarding same.	0.50
10/23/14	CDS	ASSET ANALYSIS AND RECOVERY: Draft e-mail to Receiver regarding issues with carrier's affirmative defenses; draft e-mail to JSM in preparation for call with Mr. Curly on joint demand.	0.60
10/23/14	MLB	ASSET ANALYSIS AND RECOVERY: Receive and review carrier document productions to draft stipulated facts supplement	2.20
10/23/14	MLB	ASSET ANALYSIS AND RECOVERY: Draft/revise outline of stipulated facts supplement	2.10
10/24/14	JSM	ASSET ANALYSIS AND RECOVERY: Review Order Granting PFGBI-R's Motion for Extension of Time to file a response to FDIC's Motion to Dismiss Counterclaim	0.10
10/24/14	JSM	ASSET ANALYSIS AND RECOVERY: Emails with MLB re: carriers' reinsurance	0.10
10/24/14	JSM	ASSET ANALYSIS AND RECOVERY: Review Mr. Curley's redline revisions to draft demand letter; emails with him and CDS regarding same	0.30
10/24/14	JSM	ASSET ANALYSIS AND RECOVERY: Emails with CDS re: Court's Order on stay	0.10
10/24/14	JSM	ASSET ANALYSIS AND RECOVERY: Phone conference with Mr. Curley and CDS re: revisions to draft demand letter and strategy with respect to same	0.50
10/24/14	JSM	ASSET ANALYSIS AND RECOVERY: Review joint draft demand from Mr. Curley	0.10
10/24/14	KMS	ASSET ANALYSIS AND RECOVERY: Bond - review court order on extension; calendar new deadline	0.10
10/24/14	CDS	ASSET ANALYSIS AND RECOVERY: Receive and review Mr. Curley's revisions to the joint demand letter on bond; office conference with JSM regarding same.	0.20
10/24/14	CDS	ASSET ANALYSIS AND RECOVERY: Telephone conference with Mr. Curley regarding joint demand on bond, D&O policy, and MAM policy.	0.50
10/24/14	CDS	ASSET ANALYSIS AND RECOVERY: Review e-mail regarding FDIC-R's position on joint demand; finalize Receiver's demand and draft e-mail to Mr. Curley regarding same.	0.10
10/24/14	MLB	ASSET ANALYSIS AND RECOVERY: Draft/revise continuation of supplemental stipulation of facts	2.40
10/25/14	JSM	ASSET ANALYSIS AND RECOVERY: Emails with CDS re: Mr. Curley's email with respect to Coverage H	0.10
10/26/14	JSM	ASSET ANALYSIS AND RECOVERY: Email from Mr. Murena re: his conversation with the clerk regarding the Court's Order staying the matter	0.10
10/27/14	JSM	ASSET ANALYSIS AND RECOVERY: Bond - emails with CDS regarding demand letter	0.10
10/27/14	JSM	ASSET ANALYSIS AND RECOVERY: Review demand letter	0.10
10/27/14	JSM	ASSET ANALYSIS AND RECOVERY: Emails with CDS regarding strategy for joint demand	0.10
10/27/14	JSM	ASSET ANALYSIS AND RECOVERY: Email from CDS to Mr. Lichtman re: amendment of affirmative defenses	0.10
10/27/14	CDS	ASSET ANALYSIS AND RECOVERY: Review/analyze FDIC's final joint demand letter;	0.20

PLEASE INCLUDE INVOICE NUMBER 12545 WITH YOUR PAYMENT. THANK YOU.

		finalize same to send on behalf of Receiver.	
10/27/14	CDS	ASSET ANALYSIS AND RECOVERY: Draft various e-mail correspondence with JSM regarding joint demand; draft e-mail to Mr. Curley to arrange call on same.	0.10
10/27/14	CDS	ASSET ANALYSIS AND RECOVERY: Telephone conference with Mr. Curley in order to finalize FDIC-R's joint demand letter.	0.20
10/27/14	CDS	ASSET ANALYSIS AND RECOVERY: Draft various emails regarding response to FDIC-R's motion to dismiss and carrier's revised answers and affirmative defenses.	0.20
10/27/14	MLB	ASSET ANALYSIS AND RECOVERY: Receive and review document productions re: supplemental statement of stipulated facts	0.90
10/28/14	JSM	ASSET ANALYSIS AND RECOVERY: Emails with MLB regarding Receiver's deposition	0.10
10/28/14	KMS	ASSET ANALYSIS AND RECOVERY: Review documents from Genworth, HSBC and Protective; prepare summary of additional documents that can be sought from life carriers based on their productions	2.40
10/28/14	MLB	ASSET ANALYSIS AND RECOVERY: Receive and review case law and carrier documents re: supplemental statement of stipulated facts	3.50
10/28/14	MLB	ASSET ANALYSIS AND RECOVERY: Draft/revise, complete initial draft of supplemental statement of stipulated facts	2.30
10/29/14	JSM	ASSET ANALYSIS AND RECOVERY: Bond - Email from CDS to Mr. Murena re: strategy with respect to carriers' affirmative defenses	0.10
10/29/14	JSM	ASSET ANALYSIS AND RECOVERY: Bond - Email from Receiver re: Evanston policy, evaluation of claim against Zegallz	0.10
10/29/14	JSM	ASSET ANALYSIS AND RECOVERY: Bond - emails with Mr. Curley and CDS re: Court's Order on Motion to Stay and response to Motion to Dismiss	0.10
10/29/14	CDS	ASSET ANALYSIS AND RECOVERY: Receive and review revisions to carrier's affirmative defenses in bond action; draft e-mail to Mr. Murena regarding same.	0.70
10/29/14	CDS	ASSET ANALYSIS AND RECOVERY: Telephone conference with Mr. Lichtman regarding revisions to affirmative defenses and motion for leave to amend.	0.10
10/29/14	CDS	ASSET ANALYSIS AND RECOVERY: Telephone conference with Mr. Lichtman regarding filing of motion to amend answer and affirmative defense; leave message for Mr. Curley regarding same.	0.20
10/29/14	CDS	ASSET ANALYSIS AND RECOVERY: Receive and review e-mails between Mr. Lichtman and Mr. Curley regarding amending carrier's answers and affirmative defenses; telephone conferences with Mr. Curley regarding FDIC-R's position as to stay of litigation; telephone conference with Mr. Lichtman regarding resolving issues through call to chambers.	0.70
10/29/14	MLB	ASSET ANALYSIS AND RECOVERY: Research re: legal issues in statement of stipulated facts	1.60
10/30/14	JSM	ASSET ANALYSIS AND RECOVERY: Read emails between counsel regarding effect of Court's ruling that no action be taken on affirmative defenses and the Receiver has until November 19th to respond to motion to dismiss	0.10
10/30/14	JSM	ASSET ANALYSIS AND RECOVERY: Email from Mr. Curley to Court re: FDIC does not agree to Receiver's representations	0.10
10/30/14	JSM	ASSET ANALYSIS AND RECOVERY: Review email to Ms. Smilley from CDS re: request for clarification on Court's rulings	0.10
10/30/14	JSM	ASSET ANALYSIS AND RECOVERY: Read email from Ms. Smilley transmitting Judge's instruction that the case be stayed until rulings on FDIC's motions to dismiss	0.10
10/30/14	JSM	ASSET ANALYSIS AND RECOVERY: Read email exchange with Mr Curley re: stay issue; confer with CDS re: steps to resolve.	0.20
10/30/14	JSM	ASSET ANALYSIS AND RECOVERY: Revise supplemental statement of stipulated facts.	1.90
10/30/14	JSM	ASSET ANALYSIS AND RECOVERY: Emails with Mr. Murena re: Receiver's objections to FDIC's Affirmative Defenses	0.10

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10/30/14	JSM	ASSET ANALYSIS AND RECOVERY: Bond - read email to Mr. Curley from CDS re: clarification on Court's Order	0.10
10/30/14	CDS	ASSET ANALYSIS AND RECOVERY: Receive and review e-mail from Mr. Curley regarding various orders issued by judge in bond litigation; draft e-mail to Mr. Curley seeking to resolve dispute over same.	0.40
10/30/14	CDS	ASSET ANALYSIS AND RECOVERY: Receive and review various e-mails from Mr. Curley and Mr. Lichtman regarding resolving dispute over amending St. Paul's affirmative defenses; conference with JSM regarding same; call with Mr. Lichtman regarding e-mail to chambers.	0.40
10/30/14	CDS	ASSET ANALYSIS AND RECOVERY: Receive and review e-mail from Mr. Lichtman regarding e-mail to judge; draft e-mail to chambers regarding issues with deadlines.	0.70
10/30/14	CDS	ASSET ANALYSIS AND RECOVERY: Receive and review e-mail from judge's clerk regarding governing deadlines; draft e-mail to Mr. Lichtman and Mr. Murena regarding same.	0.20
10/30/14	MLB	ASSET ANALYSIS AND RECOVERY: Draft/revise revisions to supplemental statement of stipulated facts per document review and research	3.40
10/31/14	MLB	ASSET ANALYSIS AND RECOVERY: Telephone message from opposing counsel re: discovery and mediation scheduling, return email re: same	0.20
10/31/14	MLB	ASSET ANALYSIS AND RECOVERY: Plan and prepare outline for discovery resolution, stipulated facts issues	1.00

Timekeeper	Hours	Rate	Amount
Steklof, Cary D.	21.50	250.00	\$5,375.00
Mazer, Jason S.	29.80	565.00	\$9,489.00
Shaw, Kathleen M.	25.60	235.00	\$6,016.00
Baldwin, Matthew L	100.30	260.00	\$26,078.00
Total fees for this matter	177.20 hrs.		\$46,958.00

DISBURSEMENTS

Dinsmore Consulting; Experts; Retainer for Expert	1,500.00
Federal Express; Delivery Services-Messengers; 10-07-14 Donald Dinsmore 10-01-14	23.09
West Payment Center; Online Research; services through Sep 30, 2014	153.08
West Payment Center; Online Research; services through Sep 30, 2014	226.18
Jason Mazer; Out-of-town Travel to Atlanta re Hearing before Judge Botten	1,176.99
Color Photocopies	60.00
Photocopies	411.75
Total disbursements for this matter	\$3,551.09

BILLING SUMMARY

TOTAL FEES	\$46,958.00
TOTAL DISBURSEMENTS	\$3,551.09
TOTAL CHARGES FOR THIS BILL	\$50,509.09